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**Via ECF**

Honorable Magistrate Daniel J. Stewart  
 James T. Foley United States Courthouse  
 445 Broadway, Room 441  
 Albany, New York 12207-2936

Re: Cellco Partnership, et al. v. Town of Saugerties, et al.  
 Case Number: 1:22-CV-00107  
 Our File Number: 49.000

Dear Magistrate Stewart:

Please accept this correspondence as a brief update with respect to the above-entitled matter. The parties in this case have worked diligently in attempting to reach a resolution with respect to all claims which are the subject of the present lawsuit. However, at this time, those discussions have not been completed. Nonetheless, I believe all of the parties are optimistic that a settlement will be forthcoming. Given the discovery deadlines of this case, I respectfully request, upon consent from all parties, a ninety (90) day extension to the dispositive motion deadline. While I remain optimistic, I do not want to be in a position where we have failed to comply with Your Honor's deadlines. Accordingly, all parties are requesting a ninety (90) day extension of the deadline for motions for summary judgment.

Respectfully yours,

BURKE, SCOLAMIERO & HURD

By: \_\_\_\_\_

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